From: Paddack, Mark
To: Shewmake, Kenneth
Subject: RE: Lane Plating Update
Date: Wednesday, September 26, 2018 2:53:33 PM

Mr. Shewmake:

I realize you are still in your meeting, but wanted to go ahead and provide you a response. I have done further research and found the following:

- During Phase 1 of the RA, surface soil samples were collected and analyzed from 0 - 3 inches in each grid. During Phase 2 of the RA, these same sample locations were re-sampled in the 6 to 12 and/or 12 - 18 inch interval, and the grid area was expanded, and the new grids were sampled 0 – 6 inches, 6 – 12 inches, and 12 – 18 inches.
- The November 2015 surface soil data set, presented in the May 2016 Preliminary Assessment, was collected within the same areas that were sampled by the EPA START Contractor during the 2016 RA. As such, the newer data set covers the same areas represented by the November 2105 data set. These sample results can be located under the Reference 17 tab.
- The November 2015 samples were analyzed by Pace Analytical. A Level 4 Data Package was not prepared for this data set, which will make it difficult/questionable for validation/evaluation. Additionally, GPS coordinates are not provided for the sample locations; only a map that would need to be georeferenced in to show approximate sample locations based on the locations illustrated on the sample location map.
- On the other hand, the soil, surface water, and sediment samples collected as part of the January 2017 Site Inspection (SI) Report were analyzed by ALS Laboratory Group in Salt Lake City, Utah (cyanide), and the EPA Region 6 Houston Laboratory (total metals and mercury). Analytical results for Cyanide were reviewed and validated by the EPA Region 6 Environmental Services Branch: Environmental Services Assistance Team (ESAT), and total metals and mercury results were reviewed by the TCEQ PA/SI Quality Assurance Specialist (QAS). The evaluation is included under the s Reference 43 tab in the January 2017 SI Report. GPS coordinates were collected and provided for these sample locations.
- Based on the above information, and in response to your below responses, I'm thinking we document that November 2015 data exists, but because of the above circumstances it does not meet EPA QA requirements, and therefore, has not been carried forward for use in completing the RI/FS. On the other hand, the 2017 SI data set meets EPA QA requirements, and has been carried forward for further evaluation during the RI/FS.

When you have the chance, please let me know if you concur. If you think we need to talk by phone, please let me know once you have made it back from your meeting, and I will give you a call.

Thank You,

Mark Paddack

EA Project Manager

From: Shewmake, Kenneth [mailto:shewmake.kenneth@epa.gov]
Sent: Wednesday, September 26, 2018 11:11 AM
To: Paddack, Mark
Subject: RE: Lane Plating Update

Mark,

I'm in a meeting for most of the day today so I am having trouble looking for information in the reports on sampling depths. I'm interested in 0-6 inch samples. So a 0-3" would be usable. It looks

like the EPA samples are 0-6 inch. Let me know if that is wrong. If the older TCEQ samples are in the same area, and we have adequate soil data from the more recent EPA sampling, then we do not need to use the older data. I would be interested in seeing the older sediment and surface water data. We do need to look at the older data and see if it meets EPA QA requirements. My meeting will end about 3:30 if you want to call to discuss this or other questions.

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From: Paddack, Mark [mailto:mpaddack@eaest.com]
Sent: Wednesday, September 26, 2018 9:07 AM
To: Shewmake, Kenneth <shewmake.kenneth@epa.gov>
Subject: Lane Plating Update

Mr. Shewmake:

I wanted to provide you an update that EA received the Task Order for Lane Plating, and we have initiated work on the Conceptual Understanding of the Site Technical Memorandum, as well as compiling available historical analytical data into a database. One question that has come up is in regard to soil samples that TCEQ collected in November 2015, which are documented in the May 2016 Preliminary Assessment (PA) which was prepared by TCEQ in cooperation with EPA.

As indicated on the attached maps, the November 2015 samples were collected within areas that are co-located with the grid samples collected under the supervision of EPA during the two Phases of the 2016 Removal Assessment (RA) (Phase 1 in April 2016, and Phase 2 in September 2016). Based on historical data review, the November 2015 samples were collected as discrete samples from a depth interval of 0.0 to 3.0 inches, which is inconsistent, with the intervals collected for the grid samples. This could lead to some uncertainty/inconsistency when analyzing the surface soil results in these areas where these samples are co-located.

Because of these circumstances, I wanted to check with you and get your thoughts on whether or not EA should proceed with manually entering the November 2015 analytical results into the database being developed for the site, or if you think it will better to just move forward with the 2016 RA surface soil data.

Regarding other historical analytical data, EA has located several TCEQ reports that include historical sediment and surface water sample data, and we were planning on incorporating this into the database and carrying it forward for evaluation, since this is the only historical data that has been collected from the nearby drainage systems. Regarding other historical analytical data, the May 2016 PA and several other documents indicate that other inspections/investigations have occurred at the site; however the PA indicates that no record of analytical data has been located for these prior investigations. As such, at this point it looks like the November 2016 surface soil data (discussed above) is the oldest data set on record for possible inclusion into the database being created.

When you have the chance, please let me know your thoughts on the above matters, and EA will proceed accordingly.

Thank You,

Mark Paddack
EA Project Manager